Mr. John D. Fekete
Ispat Inland, Inc.
3210 Watling Street MC8-130
East Chicago, Indiana 46312

Re: Significant Source Modification No:
089-11512-00316

Dear Mr. Fekete:

Ispat Inland, Inc., applied for a Part 70 operating permit on September 16, 1996, for a steel mill. An application to modify the source was received on November 1, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) slag granulator, identified as EU-301, with a maximum capacity of 150 tons of slag per hour, with emissions inherently reduced by quench water, and exhausting to stack S-301. The following equipment is also used in connection with the slag granulator:

(1) One (1) slurry dewatering drum, with negligible emissions due to water content, and exhausting directly to the ambient air.

(2) One (1) conveyor, identified as C-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(3) Two (1) pile stackers, identified as S-1 and S-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(4) Three (3) granulated slag piles, identified as P-1, P-2 and P-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(5) One (1) granulated slag barge loader, with particulate matter emissions reduced by water suppression, and exhausting directly to the ambient air.

(b) One (1) slag pelletizer, identified as EU-302, with a maximum capacity of 35 tons per hour, with emissions inherently reduced by quench water, and exhausting to stack S-302. The following equipment is also used in connection with the slag pelletizer:

(1) Four (4) conveyors, identified as C-3, C-4, C-5 and C-6, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(2) One (1) pellet crusher, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(3) One (1) pellet screening station, with particulate matter emissions reduced by inherent

moisture content, and exhausting directly to the ambient air.

(4) Four (4) pelletized slag piles, identified as P-4, P-5, P-6 and P-7, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(5) One (1) pelletized slag barge loader, with particulate matter emissions reduced by water suppression, and exhausting directly to the ambient air.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Autumn Marker or extension 3-0242, or dial (317) 233-0242.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
AMM
cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Dave Sampias
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 SIGNIFICANT SOURCE MODIFICATION
OFFICE OF AIR MANAGEMENT

Ispat Inland, Inc.
3210 Watling Street
East Chicago, Indiana 46312

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 089-11512-00316	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an integrated steel mill.

Responsible Official:	John D. Fekete
Source Address:	3210 Watling Street, East Chicago, Indiana 46312
Mailing Address:	3210 Watling Street MC 8-130, East Chicago, Indiana 46312
Phone Number:	(219) 399-4516 (Jim Carson)
SIC Code:	3312
County Location:	Lake
County Status:	Nonattainment for PM_{10}, SO_2, ozone and CO (portions only) Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program; Major Source, under PSD and Emission Offset Rules; Major Source, Section 112 of the Clean Air Act; 1 of 28 listed source categories under PSD and Emission Offset Rules.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

(a) One (1) slag granulator, identified as EU-301, with a maximum capacity of 150 tons of slag per hour, with emissions inherently reduced by quench water, and exhausting to stack S-301. The following equipment is also used in connection with the slag granulator:

(1) One (1) slurry dewatering drum, with negligible emissions due to water content, and exhausting directly to the ambient air.

(2) One (1) conveyor, identified as C-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(3) Two (1) pile stackers, identified as S-1 and S-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(4) Three (3) granulated slag piles, identified as P-1, P-2 and P-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(5) One (1) granulated slag barge loader, with particulate matter emissions reduced by water suppression, and exhausting directly to the ambient air.

(b) One (1) slag pelletizer, identified as EU-302, with a maximum capacity of 35 tons per hour, with emissions inherently reduced by quench water, and exhausting to stack S-302. The following equipment is also used in connection with the slag pelletizer:

(1) Four (4) conveyors, identified as C-3, C-4, C-5 and C-6, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(2) One (1) pellet crusher, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(3) One (1) pellet screening station, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(4) Four (4) pelletized slag piles, identified as P-4, P-5, P-6 and P-7, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(5) One (1) pelletized slag barge loader, with particulate matter emissions reduced by water suppression, and exhausting directly to the ambient air.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

(c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within the date of initial start-up, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

(b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this approval:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operations begin.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.9 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this approval;

(3) The Compliance Monitoring Requirements in Section D of this approval;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.11 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM, OAM, may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this approval;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented upon initial start-up of these facilities.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) Unless otherwise specified in this approval, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of initial start-up of the facilities and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) slag granulator, identified as EU-301, with a maximum capacity of 150 tons of slag per hour, with emissions inherently reduced by quench water, and exhausting to stack S-301. The following equipment is also used in connection with the slag granulator:

(1) One (1) slurry dewatering drum, with negligible emissions due to water content, and exhausting directly to the ambient air.

(2) One (1) conveyor, identified as C-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(3) Two (1) pile stackers, identified as S-1 and S-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(4) Three (3) granulated slag piles, identified as P-1, P-2 and P-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(5) One (1) granulated slag barge loader, with particulate matter emissions reduced by water suppression, and exhausting directly to the ambient air.

(b) One (1) slag pelletizer, identified as EU-302, with a maximum capacity of 35 tons per hour, with emissions inherently reduced by quench water, and exhausting to stack S-302. The following equipment is also used in connection with the slag pelletizer:

(1) Four (4) conveyors, identified as C-3, C-4, C-5 and C-6, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(2) One (1) pellet crusher, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(3) One (1) pellet screening station, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(4) Four (4) pelletized slag piles, identified as P-4, P-5, P-6 and P-7, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(5) One (1) pelletized slag barge loader, with particulate matter emissions reduced by water suppression, and exhausting directly to the ambient air.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Operational Limitations [326 IAC 2-1.1-4] [326 IAC 2-1.1-5]

The Permittee may split the slag stream between both systems, however, the Permittee shall not utilize both operations in order to increase slag processing throughput. Any operational change or modification that would increase slag processing throughput to either system would need prior approval from the OAM. In addition, at all times the slag granulator or pelletizer are operating,

the associated quench water spray shall be operating.

D.1.2 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter emissions from the granulator and pelletizer shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf) as determined by Method 5.

D.1.3 Lake County Fugitive Particulate Matter Control Requirements [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from the slag cooling and sizing activities shall be limited as follows:

(a) Batch Transfer
The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

(b) Continuous Transfer
The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(c) Wind Erosion from Storage Piles
The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

(d) Wind Erosion from Exposed Areas
The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.

(e) Material Transported by Truck or Rail
There shall be a zero percent (0%) frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.

(f) Material Transported by Front End Loader or Skip Hoist
The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(g) Material Processing Stack Emissions
The PM_{10} stack emissions shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(h) Material Processing Fugitive Emissions
The opacity of fugitive particulate emissions from a material processing facility, except crusher at which a capture system is not used, shall not exceed ten percent (10%).

(i) Material Processing Crusher Emissions
The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).

(j) Material Processing Building Enclosures
There shall be a zero percent (0%) frequency of visible emission observations from a building enclosing all or a part of the material processing equipment, except from a vent in the building.

(k) Material Processing Building Vents
The PM_{10} emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

Compliance with these limitations shall be achieved by controlling particulate matter emissions according to the Permittee's Fugitive Dust Control Plan (FDCP). The FDCP shall be updated to include all new equipment and control strategies within the date of initial start-up.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within sixty (60) days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall demonstrate compliance with Condition D.1.2 by performing PM tests on the slag granulator stack exhaust in accordance with Section C - Performance Testing, utilizing Method 5 or methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.5 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), compliance with the opacity limits specified in Condition D.1.1 shall be achieved by controlling fugitive particulate matter emissions according to the revised Fugitive Dust Control Plan (FDCP), dated March 8, 1995 (Attachment A). If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAM may request that the FDCP be revised and submitted for approval.

Opacity from the activities shall be determined as follows:

(a) Batch Transfer
The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.

(b) Continuous Transfer
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9. The opacity readings shall be taken at least four (4) feet from the point of origin.

(c) Wind Erosion from Storage Piles
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plum and at approximately right angles to the plume. The limitations may not apply during periods when application of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.

(d) Wind Erosion from Exposed Areas
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.

(e) Material Transported by Truck or Rail
Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the inplant transportation requirement.

(f) Material Transported by Front End Loader or Skip Hoist
Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:

(1) The first will be taken at the time of emission generation.

(2) The second will be taken five (5) seconds later.

(3) The third will be taken five (5) seconds later or ten (10) seconds after the first.

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet from the plume approximately and at right angles to the plume . Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

(g) Material Processing Limitations
Compliance with all opacity limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 9. Compliance with all visible emissions limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 22. Compliance with all particulate matter limitations from material processing equipments shall be determined using 40 CFR 60, Appendix A, Method 5 or 17.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 SOURCE MODIFICATION CERTIFICATION

Responsible Official: John D. Fekete
Source Address: 3210 Watling Street, East Chicago, Indiana 46312
Mailing Address: 3210 Watling Street MC 8-130, East Chicago, Indiana 46312
Source Modification No.: 089-11512-00316

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Significant Source Modification

Source Name:	Ispat Inland, Inc.
Source Location:	3210 Watling Street, East Chicago, Indiana 46312
County:	Lake County
Significant Source Modification No:	089-11512-00316
SIC Code:	3312
Permit Reviewer:	Autumn M. Marker

On January 8, 2000, Office of Air Management (OAM) had a notice published in the Gary Post Tribune, Gary, Indiana, stating that Ispat Inland, Inc. had applied for a construction permit to construct and operate a slag granulator and pelletizer. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has made the following changes (changes are bolded for emphasis):

1. For clarification, there is one stack associated with the slag granulator operation. The OAM is requiring that an initial stack test be done on the stack associated with the slag granulator in order to demonstrate compliance with the 0.03 grains per dry standard cubic foot particulate matter limit pursuant to 326 IAC 6-1-2. The stack test to show compliance with 326 IAC 6-1-2 will be for particulate matter (PM) only. The source will not be required to do visible emissions testing in order to demonstrate compliance with the opacity limitations in D.1.3. The source will comply with the opacity limitations in D.1.3 by following their fugitive dust control plan.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within sixty (60) days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall demonstrate compliance with Condition~~s~~ D.1.2 ~~and D.1.3~~ by performing PM tests **on the slag granulator stack exhaust** in accordance with Section C - Performance Testing, utilizing methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

2. Condition D.1.1 is revised to more clearly reflect the OAM's intention when the condition was written.

D.1.1 Operational Limitations [326 IAC 2-1.1-4] [326 IAC 2-1.1-5]

The Permittee **may split the slag stream between both systems, however, the Permittee** ~~shall direct slag to either the slag granulator/pelletizer operations or the existing slag cooling pits/sizing operations, but~~ shall not utilize both operations ~~for slag processing~~ **in order to increase slag processing throughput. Any operational change or modification that would increase slag processing throughput to either system would need prior approval from the OAM.** In addition, at all times the slag granulator or pelletizer are operating, the associated quench water spray shall be operating.

3. Conditions D.1.2 and D.1.4 are revised to reflect what test method is required by the rule. The

test method required by the rule does not include condensible particulate matter.

D.1.2 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter emissions from the granulator and pelletizer shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf) **as determined by Method 5**.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within sixty (60) days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall demonstrate compliance with Condition D.1.2 by performing PM tests on the slag granulator stack exhaust in accordance with Section C - Performance Testing, utilizing **Method 5 or** methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Significant Source Modification

Source Background and Description

Source Name:	Ispat Inland, Inc.
Source Location:	3210 Watling Street, East Chicago, 46312
County:	Lake
SIC Code:	3312
Operation Permit No.:	T 089-6577-00316
Operation Permit Issuance Date:	Not issued yet
Significant Source Modification No.:	089-11512-00316
Permit Reviewer:	Bryan Sheets

The Office of Air Management (OAM) has reviewed a modification application from Ispat Inland, Inc., relating to the construction of the following emission units and pollution control devices:

(a) One (1) slag granulator, identified as EU-301, with a maximum capacity of 150 tons of slag per hour, with emissions inherently reduced by quench water, and exhausting to stack S-301. The following equipment is also used in connection with the slag granulator:

(1) One (1) slurry dewatering drum, with negligible emissions due to water content, and exhausting directly to the ambient air.

(2) One (1) conveyor, identified as C-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(3) Two (1) pile stackers, identified as S-1 and S-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(4) Three (3) granulated slag piles, identified as P-1, P-2 and P-2, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(5) One (1) granulated slag barge loader, with particulate matter emissions reduced by water suppression, and exhausting directly to the ambient air.

(b) One (1) slag pelletizer, identified as EU-302, with a maximum capacity of 35 tons per hour, with emissions inherently reduced by quench water, and exhausting to stack S-302. The following equipment is also used in connection with the slag pelletizer:

(1) Four (4) conveyors, identified as C-3, C-4, C-5 and C-6, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(2) One (1) pellet crusher, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(3) One (1) pellet screening station, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(4) Four (4) pelletized slag piles, identified as P-4, P-5, P-6 and P-7, with particulate matter emissions reduced by inherent moisture content, and exhausting directly to the ambient air.

(5) One (1) pelletized slag barge loader, with particulate matter emissions reduced by water suppression, and exhausting directly to the ambient air.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the introduction of water in the granulator and pelletizer be considered as integral in controlling emissions from slag cooling.

(a) The water is used to quench the slag in this process. During operation, the hot, molten slag is run through a box where it is sprayed with a much cooler stream of water which quenches the slag quickly. The design of the system allows the slag to cool so quickly that it vitrifies the slag into granules. This quick cooling helps reduce the oxidation of sulfur and nitrogen and the water helps to suppress particulate matter emissions. Because the entire process is based on the water spray operation, it should be considered an integral means of reducing emissions.

IDEM, OAM has evaluated the justifications and agrees that the water spray will be considered as an integral part of the slag cooling process. Therefore, the permitting level will be determined using the potential to emit after the introduction of water.

Enforcement Issue

The source has the following enforcement actions pending:

(1) Cause Nos. A-4572, A-4592 and A-4596: On March 31, 1999, April 28, 1999, and June 14, 1999, Ispat Inland, Inc., located at 3210 Watling Street, East Chicago, Indiana, was in violation of 326 IAC 6-1-10.1(e) for the No. 2 basic oxygen furnace (BOF) and the No. 4 BOF reladling and desulfurization baghouse.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
301	Slag Granulator	240	13	73,000	160
302	Slag Pelletizer	65	33 x 62	368,280	120

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 1, 1999. Additional information was received on November 22, 1999 and December 14, 1999.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct, except for the SO_2 emission factor used for the existing slag pits. The IDEM, OAM believes that an emission factor of 0.5 lbs/ton slag processed should be used since this has been used in recent SO_2 SIP modeling. The IDEM, OAM is aware that the emission factor used in the SIP modeling may be corrected in the future to reflect what has been submitted in this application. However, at this time IDEM, OAM feels it is necessary to use the more conservative value.

Using the value of 0.5 lbs/ton slag processed results in past actual emissions of 248.3 tons SO_2 per year. This value will be used in the NSR applicability determination. The applicants calculations are provided in Appendix A of this document.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	171.19
PM_{10}	52.25
SO_2	65.20
VOC	0.65
CO	42.38
NO_x	6.52
Fluoride	18.06
H_2S	45.64

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f) because the potential to emit PM_{10}, SO_2 and H_2S is greater than 25 tons per year. Since the applicant's Part 70 operating permit has not been issued, this approval is for construction and operation.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM_{10}	Moderate Nonattainment (portions only)
SO_2	Marginal Nonattainment (portions only)
NO_2	Attainment or Unclassifiable
Ozone	Severe Nonattainment (portions only)
CO	Nonattainment (portions only)
Lead	Attainment or Unclassifiable

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Certain cities of Lake County have been designated as nonattainment for ozone. Ispat Inland is located in East Chicago which has been designated nonattainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Portions of Lake County have also been classified as nonattainment for CO, PM_{10} and SO_2. Ispat Inland is located in the nonattainment areas for PM_{10} and SO_2, but not for CO. Therefore, PM_{10} and SO_2 emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3 and CO was reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.

(c) Lake County has been designated attainment or unclassifiable for all other regulated pollutants. Therefore, these pollutants were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	1,095
PM-10	1,095
SO_2	14,595
VOC	4,528
CO	5,502
NOx	12,202

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the 28 listed source categories.

(b) These emissions are based upon the Facility Quick Look Report, dated 1996, and the previous permit.

New Source Review Applicability

The table below summarizes the potential to emit from the proposed modification based on 8,760 hours of operation per year at rated capacity including enforceable emission controls and production limits, where applicable. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	PM (ton/yr)	PM_{10} (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_X (ton/yr)	Fluoride (ton/yr)	H_2S (ton/yr)
Proposed PTE from Slag Granulation/ Pelletization and Associated Equipment	171.19	52.25	65.20	0.65	42.38	6.52	18.06	45.64
Past Actual Emissions from Slag Cooling Pits and Associated Equipment*	219.23	71.86	284.3	1.16	42.71	12.32	27.46	95.85
Net Emissions Increase	-48.04	-19.61	-219.1	-0.51	-0.33	-5.8	-9.4	-50.21
NSR "Significant" Level	25	15	40	25	100	40	3	10

* Based on the average of 1997 and 1998 emissions.

Since the net emissions increase for VOC and NOx are less than zero from the project, the emissions are considered "de minimis" for the purposes of emission offset. Since this is a modification of an existing process, the past actual to future potential methodology has been used to determine the net emissions increase from the process due to the modification.

The new equipment will modify the process such that it allows an alternative method to cool and size the slag produced from blast furnace no. 7. With the existing process, slag sits for long periods of time in the slag pits, where the slag smolders and emits a great amount particulate matter, sulfur dioxide and hydrogen sulfide. The alternative method of granulation or pelletization sprays a constant stream of water into a drop box where slag is falling. This method instantaneously vitrifies the slag, binding much of the sulfur and other impurities into the slag which prevents oxidation and emissions. In addition, the quick cooling of the slag prevents smoldering PM emissions. The process will not and cannot operate such that slag could be directed to both the existing pits/sizing equipment and the new granulator/pelletizer equipment. Although the existing slag pits will not be shutdown after the new equipment is installed (they will still be used in emergency situations), any emissions from the new equipment would be offset by a greater decrease from not sending the slag to the existing pits and sizing equipment.

This modification to an existing major stationary source is not major because the emissions increase from each pollutant is less than its associated PSD or Emission Offset significant level. Therefore, pursuant to 326 IAC 2-2, 326 IAC 2-3, and 40 CFR 52.21, the PSD and Emission Offset requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2-6 (Emission Reporting)

These facilities are subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr of VOC and NO_X in Lake County . Pursuant to this rule, the owner/operator of this source must annually submit an emission statement of the source. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 4-1 (Open Burning)

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter emissions from the granulator and pelletizer shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from the new emission unit stacks and fugitive sources shall not exceed the following limitations:

(a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).

(c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

(f) There shall be a zero percent (0%) frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.

(g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(h) There shall be a zero percent (0%) frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(i) The PM_{10} emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute opacity standard.

(l) PM_{10} emissions from each material processing stack shall not exceed 0.022 grains per dry standard cubic foot and ten percent (10%) opacity.

(m) Fugitive particulate matter from the material processing facilities shall not exceed ten percent (10%) opacity.

Material processing facilities include crushers, screens, grinders, mixers, dryers, belt conveyors, bucket elevators, bagging operations, storage bins, and truck or railroad car loading stations.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Permittee's Continuous Compliance Plan (CCP). The CCP shall be updated to include all new equipment and control strategies within the date of initial start-up.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Since the units being permitted do not use add-on control devices and have potential emissions less than 10 pounds per hour, there are no applicable compliance monitoring requirements for these units.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 089-11512-00316.